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Attorneys for Defendant UNITED PUBLIC WORKERS, AFSCME, LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

) WORKERS' POSITION vs.) STATEMENT RE: THIRD-PAR) DEFENDANT GARY W. UNITED PUBLIC WORKERS,) RODRIGUES' FIFTH MOTION AFSCME LOCAL 646, AFL-CIO,) LIMINE TO BAR ALL) TESTIMONY OR EVIDENCE O Defendant,) DEFENDANT'S ALLEGED	JEANNE ENDO,) CIVIL NO. CV03-00563 LEK
) WORKERS' POSITION vs.) STATEMENT RE: THIRD-PAR) DEFENDANT GARY W. UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO, Defendant, Defendant, Vs.) DEFENDANT'S ALLEGED NELATIONSHIPS WITH WOM Vs.) OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES,))
vs.) STATEMENT RE: THIRD-PAR) DEFENDANT GARY W. UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO, Defendant, Defendant, Vs.) DEFENDANT GARY W. RODRIGUES' FIFTH MOTION LIMINE TO BAR ALL TESTIMONY OR EVIDENCE OF DEFENDANT'S ALLEGED RELATIONSHIPS WITH WOM Vs.) OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES,)	Plaintiff,) DEFENDANT UNITED PUBLIC
DEFENDANT GARY W. UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO, Defendant, Defendant, Vs. OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES, DEFENDANT GARY W. OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE) WORKERS' POSITION
UNITED PUBLIC WORKERS, AFSCME LOCAL 646, AFL-CIO, Defendant, Vs. OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES, PRODRIGUES' FIFTH MOTION LIMINE TO BAR ALL DEFENDANT'S ALLEGED RELATIONSHIPS WITH WOM OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE	VS.) STATEMENT RE: THIRD-PARTY
AFSCME LOCAL 646, AFL-CIO, Defendant, Vs. OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES, DIMINE TO BAR ALL TESTIMONY OR EVIDENCE OF COMMENT O) DEFENDANT GARY W.
Defendant, Defendant, Defendant, DEFENDANT'S ALLEGED RELATIONSHIPS WITH WOM OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES,)	UNITED PUBLIC WORKERS,) RODRIGUES' FIFTH MOTION IN
Defendant, vs. Defendant, RELATIONSHIPS WITH WOM OTHER THAN PLAINTIFF; CERTIFICATE OF SERVICE GARY W. RODRIGUES,)	AFSCME LOCAL 646, AFL-CIO,) LIMINE TO BAR ALL
vs.) RELATIONSHIPS WITH WOM) OTHER THAN PLAINTIFF;) CERTIFICATE OF SERVICE GARY W. RODRIGUES,)) TESTIMONY OR EVIDENCE OF
vs.) OTHER THAN PLAINTIFF;) CERTIFICATE OF SERVICE GARY W. RODRIGUES,)	Defendant,) DEFENDANT'S ALLEGED
GARY W. RODRIGUES,) CERTIFICATE OF SERVICE)) RELATIONSHIPS WITH WOMEN
GARY W. RODRIGUES,)	VS.) OTHER THAN PLAINTIFF;
)) CERTIFICATE OF SERVICE
Third-Party Defendant.)	GARY W. RODRIGUES,)
Third-Party Defendant.))
	Third-Party Defendant.	
) TRIAL DATE: May 13, 2008) TRIAL DATE: May 13, 2008
)		

DEFENDANT UNITED PUBLIC WORKERS' POSITION STATEMENT RE: THIRD-PARTY DEFENDANT GARY W. RODRIGUES' FIFTH MOTION IN LIMINE TO BAR ALL TESTIMONY OR EVIDENCE OF DEFENDANT'S ALLEGED RELATIONSHIPS WITH WOMEN OTHER THAN PLAINTIFF

Defendant United Public Workers, AFSCME Local 646, AFL-CIO ("UPW") does not oppose THIRD-PARTY DEFENDANT GARY W. RODRIGUES' FIFTH MOTION IN LIMINE TO BAR ALL TESTIMONY OR EVIDENCE OF DEFENDANT'S ALLEGED RELATIONSHIPS WITH WOMEN OTHER THAN PLAINTIFF, filed April 22, 2008, except that Mr. Rodrigues' admitted consensual relationships with former employees Georgietta (Carroll) Chock and Tani (Akiona) Olaso are relevant to explain why Mr. Rodrigues and Plaintiff kept their alleged relationship confidential.

DATED: Honolulu, Hawaii, April 29, 2008.

/s/ Charles A. Price
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CHARLES A. PRICE
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UNITED PUBLIC WORKERS,
AFSCME, LOCAL 646, AFL-CIO